

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

AUTOSCRIBE CORPORATION

Plaintiff

v.

M&A VENTURES, LLC

Defendant.

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Case No. 1:24-cv-04282-SCJ

JURY TRIAL DEMANDED

**REVISED JOINT CLAIM CONSTRUCTION CHART**

Plaintiff Autoscribe Corporation (“Autoscribe”) and Defendant M&A Ventures, LLC (“M&A”) hereby submit their Revised Joint Claim Construction Chart, attached as Exhibit A, reflecting the disputed claim terms and supporting evidence.

The claim terms proposed for construction below are found within U.S. Patent No. 11,620,621 (the “’621 Patent”).

M&A objects to Autoscribe’s reliance on extrinsic evidence, in particular Exhibits O and R to its Responsive Claim Construction Brief, which was not previously disclosed through Autoscribe’s disclosure of extrinsic evidence or the original Joint Claim Construction Statement as required by the local patent rules.

As reflected in Exhibit A, M&A no longer seeks construction of the following claim terms:

- “providing a non-sensitive data token to the merchant... without providing the non-sensitive data token to the payer” (Claims 1, 8, and 25)
- “receiving the non-sensitive electronic data token from the secure server, wherein...the secure server does not provide the non- sensitive electronic data token to the payer” (Claims 15 and 23)
- “generating a uniform resource locator (url),... the url comprising either: a dynamic url generated by the secure server...; or a static url and a hypertext transport protocol (http) parameter...” (Claims 1, 8, and 25).

M&A agrees that it will not raise arguments inconsistent with or attempt to deviate from the plain and ordinary meaning as described by the Patent Trial and Appeals Board.

Dated: February 7, 2025

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**Exhibit A: Disputed Claim Terms and Evidence**

Claim term	Autoscribe's proposed construction and supporting evidence	M&A's proposed construction and supporting evidence
<p>“sensitive financial account information”</p> <p>(Claims 1, 8, 15, 23, 25, and other dependent claims)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>• '621 Patent, including at: 1:24–29, 1:59–62, 8:2–14, Claim 1</li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>• Ex. A (www.merriam-webster.com) (including at “sensitive”)</li> <li>• Ex. H (www.britannica.com/dictionary) (including at “sensitive”)</li> </ul>	<p>Indefinite; alternatively,</p> <p>“financial account information whose storage requires compliance with one or more information security standards”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>'621 Patent, including at 1:45-48, 1:63-2:3, 2:35-39, 8:8-14</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000207</p> <p><b><u>Extrinsic Evidence</u></b></p> <p>Exhibit B, Expert Testimony of Dr. Michael Shamos</p>

Claim term	Autoscribe’s proposed construction and supporting evidence	M&A’s proposed construction and supporting evidence
<p>“obtain[ing] the [second] payment amount</p> <p>///</p> <p>forward[ing] at least a portion of the [second] payment amount”</p> <p>(Claims 1, 2, 8, 9, 15, 23, and 25)</p>	<p>“obtaining the payment amount and causing or requesting at least a portion of the payment amount to be sent, directed, or credited”</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>• ’621 Patent, including at: <ul style="list-style-type: none"> <li>○ 10:58–60</li> <li>○ Claims 1, 2, 8, 9, 15, 23, 25</li> </ul> </li> <li>• Prosecution history, including at ASC000033, ASC000108, ASC000502, ASC000527</li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>• Ex. O (<a href="http://www.plaid.com/resources/ach/how-does-an-ach-transfer-work/">www.plaid.com/resources/ach/how-does-an-ach-transfer-work/</a>)</li> </ul>	<p>“obtain[ing] the money required for the [second] payment”</p> <p>///</p> <p>“forward[ing] at least a portion of the money required for the [second] payment”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>’621 Patent, including at 9:16-19, 10:54</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000033, ASC000527, ASC000664</p> <p>M&amp;A objects to Autoscribe’s reliance on extrinsic evidence, in particular Exhibit O to its Responsive Claim Construction Brief, which was not previously disclosed through Autoscribe’s disclosure of extrinsic evidence or the original Joint Claim Construction Statement as required by the local patent rules.</p>

Claim term	Autoscribe’s proposed construction and supporting evidence	M&A’s proposed construction and supporting evidence
<p>“authenticate[s] a payee”/  “authenticating the payee”</p> <p>(Claims 1, 8, 15, 23, and 25)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>’621 Patent, including at: <ul style="list-style-type: none"> <li>10:46–50, 13:55–14:12</li> </ul> </li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>Ex. H to Dkt. 139</li> </ul> <p>PTAB Docket:</p> <ul style="list-style-type: none"> <li><i>M&amp;A Ventures v. Autoscribe</i>, IPR2024-01159, Papers 4, 12</li> </ul>	<p>“verify[ies] the identity of the payee/verifying the identity of the payee”</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>’621 Patent, including at 2:19-22, 2:25, 2:64-3:3, 3:9-15, 10:15-19, 10:46-50, 12:54-58, 13:7, 13:62-14:15</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000279-ASC000290</p> <p>U.S. Patent Application No. 16/535,424 (’621 Patent Application), including at [0072], Fig. 4f</p> <p><b><u>Extrinsic Evidence</u></b></p> <p>“Authentication. In computers and communications, the process of verifying the legitimacy of a transmission, user, or system. Measures such as passwords and digital signatures are employed.” Wiley Electrical and Electronics Engineering Dictionary (2004) at 298.</p> <p>“Authentication. A process by which subjects, normally users, establish their identity to a system. This may be effected by the use of a password or possession of a physical device, e.g. a coded token.” Dictionary of Computer Science (2016) at 32.</p>

Claim term	Autoscribe's proposed construction and supporting evidence	M&A's proposed construction and supporting evidence
<p>"function"</p> <p>(Claims 1, 8, 15, 23, and 25)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>'621 Patent, including at: <ul style="list-style-type: none"> <li>5:57–61</li> </ul> </li> <li>Prosecution History, including at ASC000304–10, ASC000313–88, ASC000338, ASC000371, ASC000458, ASC000492, ASC000500</li> <li>Ex. B (including at p.18)</li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>Ex. H to Dkt. 139</li> </ul> <p>PTAB Docket</p> <ul style="list-style-type: none"> <li><i>M&amp;A Ventures v. Autoscribe</i>, IPR2024-01159, Papers 4, 12</li> </ul>	<p>"block of code that operates as a single logical unit"</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>'621 Patent, including at 5:57-61, 13:55-57, 14:60-62</p> <p><b><u>Extrinsic Evidence</u></b></p> <p>"3. Within a computer program, a small group of instructions which perform a given task. Also called subroutine (2), routine (1), or procedure (2)." Wiley Electrical and Electronics Engineering Dictionary (2004) at 306.</p> <p>"A piece of code that operates as a single logical unit. A function is called by name, accepts optional input parameters, and returns a status and optional output parameters. Many programming languages support functions." Dictionary of Computer and Internet Terms Vol 1 (2016) at 217.</p>

Claim term	Autoscribe’s proposed construction and supporting evidence	M&A’s proposed construction and supporting evidence
<p>“perform[ing] each software process required to maintain compliance with one or more information security standards”</p> <p>(Claims 1, 8, and 25)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>• ’621 Patent at: <ul style="list-style-type: none"> <li>○ 1:24–2:3, 5:62–6:4, 7:8–12, 8:8–14, 10:51–60</li> </ul> </li> <li>• Prosecution history, including at ASC000304–10, ASC000313–88</li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>• Ex. A (including at “perform,” “software,” “required,” “maintain,” and “compliance”)</li> </ul>	<p>Indefinite</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>’621 Patent, including at 1:30-33, 1:63-2:3; 5:62-6:4; 7:8-12; 10:51-57</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000194, ASC000314</p> <p><b><u>Extrinsic Evidence</u></b></p> <p>Exhibit B, Expert Testimony of Dr. Michael Shamos</p>



Claim term	Autoscribe's proposed construction and supporting evidence	M&A's proposed construction and supporting evidence
<p>"a representation of the non-sensitive electronic data token"</p> <p>(Claims 2, 9, 15, and 23)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>• '621 Patent, including at: <ul style="list-style-type: none"> <li>○ 1:52-56; 2:64-3:3; 3:6-15; 7:1-8; 7:31-34; 7:44-49; 8:40-43, 8:52-59; 9:12-19; 10:46-48; 13:39-54</li> <li>○ Claims 1, 2, 3, 4, 8, 9, 10, 15, 16, 23</li> </ul> </li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>• Ex. A (including at "representation" and synonyms of "representation")</li> <li>• Ex. I (including at "representation")</li> <li>• Ex. R</li> </ul>	<p>Indefinite</p> <p><b><u>Intrinsic Evidence</u></b></p> <p>'621 Patent, including at 1:52-59, 3:9-15, 8:40-43, 8:52-9:11, 10:46-48</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000120</p> <p><b><u>Extrinsic Evidence</u></b></p> <p>"representation. 2. Something that represents, as: a. An image or likeness of something."</p> <p>American Heritage Dictionary of the English Language (2018) at 1490.</p> <p>"representation. 3 [c] something, for example a painting or sign, that shows or describes something else"</p> <p>Longman Dictionary of American English (2014) at 947.</p> <p>Exhibit B, Expert Testimony of Dr. Michael Shamos</p> <p>M&amp;A objects to Autoscribe's reliance on extrinsic evidence, in particular Exhibit R to its Responsive Claim Construction Brief, which was not previously disclosed through Autoscribe's disclosure of extrinsic evidence or the original Joint Claim Construction Statement as required by the local patent rules.</p>

Claim term	Autoscribe's proposed construction and supporting evidence	M&A's proposed construction and supporting evidence
<p>“wherein the representation of the non-sensitive electronic data token is the non-sensitive electronic data token”</p> <p>(Claims 3, 10, and 16)</p>	<p>Plain and ordinary meaning</p> <p>Intrinsic evidence:</p> <ul style="list-style-type: none"> <li>• '621 Patent, including at:               <ul style="list-style-type: none"> <li>○ 1:52-56; 2:64-3:3; 3:6-15; 7:1-8; 7:31-34; 7:44-49; 8:40-43, 8:52-59; 9:12-19; 10:46-48; 13:39-54</li> <li>○ Claims 1, 2, 3, 4, 8, 9, 10, 15, 16, 23</li> </ul> </li> </ul> <p>Extrinsic evidence:</p> <ul style="list-style-type: none"> <li>• Ex. A (including at “representation” and synonyms of “representation”)</li> <li>• Ex. I (including at “representation”)</li> <li>• Ex. R</li> </ul>	<p>Indefinite</p> <p><b><u>Intrinsic Evidence</u></b>          '621 Patent, including at 1:52-59, 3:9-15, 8:40-43, 8:52-9:11, 10:46-48,</p> <p>Prosecution History of U.S. Patent No. 11,620,621, including at ASC000120</p> <p><b><u>Extrinsic Evidence</u></b>          Exhibit B, Expert Testimony of Dr. Michael Shamos</p> <p>M&amp;A objects to Autoscribe's reliance on extrinsic evidence, in particular Exhibit R to its Responsive Claim Construction Brief, which was not previously disclosed through Autoscribe's disclosure of extrinsic evidence or the original Joint Claim Construction Statement as required by the local patent rules.</p>